

PHILLIP A. TALBERT
United States Attorney
ROGER YANG
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW GOYDER,

Defendant.

CASE NO. 2:20-CR-0212 TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: March 30. 2023
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, Alexis Nelsen, and defendant, Matthew Goyder by and through defendant's counsel of record, Linda Parisi, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 30. 2023.
2. By this stipulation, defendant now moves to continue the status conference until June 22, 2023, at 9:30 a.m., and to exclude time between March 30. 2023, and June 22, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 6,000 pages of documents as well as digital evidence. All of this

1 discovery has been either produced directly to counsel and/or made available for inspection and
2 copying.

3 b) Counsel for defendant desires additional time to consult with her client, review
4 current charges, conduct investigation and research related to the charges, to discuss potential
5 resolutions with her client, and otherwise prepare for trial. Counsel will be in a capital trial
6 between now and the end of May, so this continuance will also ensure continuity of counsel.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny her the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of March 30, 2023 to June 22, 2023,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
17 because it results from a continuance granted by the Court at defendant's request on the basis of
18 the Court's finding that the ends of justice served by taking such action outweigh the best interest
19 of the public and the defendant in a speedy trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
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5. Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 28, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ ROGER YANG
ROGER YANG
Assistant United States Attorney

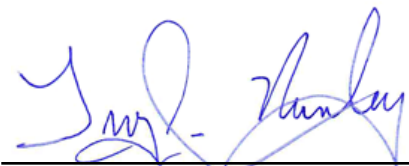
Dated: March 28, 2023

/s/ LINDA PARISI
LINDA PARISI
Counsel for Defendant
MATTHEW GOYDER

FINDINGS AND ORDER

The Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court vacates the March 30, 2023, status conference and resets the matter for a status conference on June 22, 2023, at 9:30 a.m. The Court also finds that based on the facts set forth in the parties' stipulation, the failure to exclude time between March 30, 2023, and June 22, 2023, would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from March 30, 2023, to and including June 22, 2023, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4.

IT IS SO FOUND AND ORDERED this 28th day of March, 2023


Troy L. Nunley
United States District Judge